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32 Attorneys for Defendant: Otto Trucking LLC

33 **UNITED STATES DISTRICT COURT**

34 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

35 WAYMO LLC,

36 Case No. 3:17-cv-00939-WHA

37 Plaintiff,

38 **DEFENDANT OTTO TRUCKING LLC'S
39 ADMINISTRATIVE MOTION TO FILE
40 UNDER SEAL**

41 UBER TECHNOLOGIES, INC.;
42 OTTOMOTTO LLC; OTTO TRUCKING
43 LLC,

44 Courtroom: 8, 19th Floor
45 Judge: Hon. William H. Alsup

46 Defendants.

47 Filed/Lodged Concurrently with:
48 1. Declaration ISO Admin. Mot. to File
49 Documents Under Seal
50 2. [Proposed] Order
51 3. Redacted/Unredacted Versions
52 4. Proof of Service

1 Pursuant to Civil Local Rules 7-11 and 79-5, Defendant Otto Trucking LLC (“Otto
 2 Trucking”) submits this administrative motion for an order to file under seal portions of its Reply
 3 Supporting Its Motion to Compel Further Discovery re: Waymo’s Investigation [Dkt. 2035] and
 4 exhibits thereto (the “Administrative Motion”). Specifically, Otto Trucking requests an order
 5 granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Parties Claiming Confidentiality
Otto Trucking’s Reply	Highlighted portions	Plaintiff
Exhibit 2 to the Boock Declaration	Entire document	Plaintiff
Exhibit 3 to the Boock Declaration	Entire document	Plaintiff

12 The entirety of Otto Trucking’s Reply and Exhibits 1 and 3 contain information that
 13 Plaintiff Waymo LLC (“Waymo”) has designated “Confidential” or “Highly Confidential –
 14 Attorneys’ Eyes Only” pursuant to the Protective Order in this case. Otto Trucking states no
 15 position about whether the confidentiality designations are appropriate, except to object to the
 16 sealing of the entirety of Exhibit 2, because although Waymo designated the transcript as Highly
 17 Confidential at the deposition, it never served narrowed confidentiality. Otto Trucking anticipates
 18 that Waymo will file any necessary declarations to seal the above information pursuant to Local
 19 Rule 79-5.

20 Otto Trucking’s request to seal is narrowly tailored to those portions of the Administrative
 21 Motion and its supporting documents that merit provisional sealing.

23 Dated: October 30, 2017

Respectfully submitted,

24 By: /s/ Todd Boock

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document including all of its attachments with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on **October 30, 2017**. I further certify that all participants in the case are registered CM/ECF users and that service of the publicly filed documents will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed on
October 30, 2017.

/s/ Todd A. Boock
TODD A. BOOCK